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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
:
:
- v. - :
:
EDWIN VARGAS, :
:
Defendant. :
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INFORMATION
13 CRIM 535

COUNT ONE
(Conspiracy to Commit Computer Hacking)

The United States Attorney charges:

1. From at least in or about April 2010, up to and including in or about October 2012, in the Southern District of New York and elsewhere, EDWIN VARGAS, the defendant, and others known and unknown, willfully and knowingly, combined, conspired, confederated, and agreed together and with each other to engage in computer hacking, in violation of Title 18, United States Code, Section 1030(a)(2)(C).

2. It was a part and object of the conspiracy that EDWIN VARGAS, the defendant, and others known and unknown, would and did intentionally access a computer without authorization and exceed authorized access, and thereby did obtain information from a protected computer, to wit, VARGAS paid certain e-mail hacking services to hack into numerous e-mail accounts which did not belong to him in order to obtain the log-in credentials for those accounts.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York by EDWIN VARGAS, the defendant:

a. In or about March 2011, VARGAS provided an e-mail hacking service with proof of payment in order to obtain the password and username which he had ordered from the e-mail hacking service for an e-mail account to which he did not have authorized access.

b. On or about June 18, 2012, in the Bronx, New York, VARGAS accessed a victim's e-mail account without authorization.

(Title 18, United States Code, Section 1030(b).)

COUNT TWO

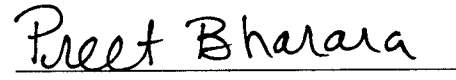
(Unauthorized Access of Law Enforcement Database)

The United States Attorney further charges:

4. On or about November 5, 2011, in the Southern District of New York, EDWIN VARGAS, the defendant, intentionally and knowingly accessed a computer without authorization and exceeded authorized access, and thereby obtained information from a department and agency of the United States, to wit,

VARGAS accessed, and obtained information from, the federal National Crime Information Center database, without authorization, and exceeding the scope of his authority.

(Title 18, United States Code, Section 1030(a)(2)(B).)



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

- v. -

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Defendant.

MISDEMEANOR INFORMATION

13 Cr. __

18 U.S.C. §1030

PREET BHARARA
United States Attorney.
